

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA §
§
v. § No. 4:21-cr-00300-SDJ-KPJ
§
CALVIN AUTAE THOMPSON (11) §
a.k.a. "C-Mo" §

**DEFENDANT CALVIN AUTAE THOMPSON'S REQUEST FOR STATUS
CONFERENCE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant, Calvin Autae Thompson ("Defendant"), by and through his undersigned counsel and submits this Request for a Status Conference in the above-referenced matter. In support, Defendant states as follows:

I. PROCEDURAL BACKGROUND

The matter is currently set for trial on February 3, 2025, but there is a pending motion to continue the trial date. The procedural history of this case is complex and reflects significant challenges stemming from Mr. Thompson's conduct and filings. Mr. Thompson was arrested on July 27, 2023, and on August 2, 2023, a detention hearing was held before Magistrate Judge Kimberly C. Priest Johnson, who ordered him detained pending trial.

Shortly after his detention, Mr. Thompson began filing multiple *pro se* motions, requesting the appointment of new counsel. Between August 16, 2023, and September 29, 2023, Mr. Thompson filed four separate motions to appoint new counsel, despite having representation during this period. On October 9, 2023, the Court granted Mr. Thompson's fourth request and appointed undersigned counsel, Derek Staub.

Since Staub's appointment, Mr. Thompson has continued to act in a manner that complicates representation. He filed a *pro se* motion to dismiss due to a lack of evidence on December 27, 2023, which the Court struck from the record on January 3, 2024, noting that he could not file motions while represented by counsel. Nevertheless, his filing required attention and caused further delays. On January 24, 2024, undersigned counsel filed a motion to dismiss the indictment or, in the alternative, for a bill of particulars on Mr. Thompson's behalf. This motion was ultimately denied following a Report and Recommendation issued on June 13, 2024, and adopted by the Court on August 25, 2024.

Most recently, on January 16, 2025, Mr. Thompson filed yet another *pro se* motion, requesting a Franks Hearing. Despite counsel's repeated efforts to explain the legal process and the importance of working collaboratively, Mr. Thompson has continued to act independently, often disregarding advice and undermining his own case. Undersigned counsel met with Mr. Thompson on January 17, 2025, to discuss his most recent filing and options, he insisted that he wished to address the Court directly and speak with the prosecuting attorney. This persistent behavior not only complicates representation but also creates confusion and inefficiencies in the administration of this case.

II. REASON FOR REQUEST

A status conference is necessary to address several critical and recurring issues that are hindering progress in this matter. First, the pending motion to continue the trial date requires the Court's attention and resolution, as it impacts the preparation and scheduling for both parties. Second, Mr. Thompson's *pro se* motion for a hearing and his insistence on addressing the Court directly need to be resolved to ensure that his rights are protected while also maintaining proper legal procedures.

More broadly, Mr. Thompson's ongoing actions, including his pattern of filing *pro se* motions while represented, have created significant challenges for undersigned counsel. These actions have caused delays, diverted resources, and complicated the attorney-client relationship. Mr. Thompson's refusal to adhere to counsel's guidance has made it exceedingly difficult to provide effective representation and ensure that this case proceeds efficiently and fairly. A status conference would provide an opportunity to address these ongoing issues and establish a clear path forward, both procedurally and substantively.

III. CONCLUSION

Counsel is available at the Court's earliest convenience and respectfully requests that the Court schedule a status conference at its first availability. This conference is critical to ensure the orderly and fair progression of this case and to address the matters outlined above.

WHEREFORE, Defendant Calvin Autae Thompson, respectfully requests that the Court schedule a status conference to address the matters outlined above and for any other relief the Court deems just and proper.

Respectfully submitted,

FROST BROWN TODD LLP

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**ATTORNEYS FOR DEFENDANT
CALVIN AUTAE THOMPSON**

CERTIFICATE OF CONFERENCE

I hereby certify that undersigned counsel conferred with Assistant United States Attorney Heather Rattan on Monday, January 17, 2025, regarding this motion. AUSA Rattan indicated that she is unopposed to the relief requested herein.

/s/ Derek R. Staub
Derek R. Staub

CERTIFICATE OF SERVICE

On January 21, 2025, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, for the Eastern District of Texas. I hereby certify that I have served the documents on all counsel and/or *pro se* parties of record in a manner authorized by Fed. R. Crim. P. 49.

/s/ Derek R. Staub
Derek R. Staub

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